

AO 91 (Rev. 02/09) Criminal Complaint

United States District Court

for the
Western District of New York

United States of America

v.

SHANE GUAY

Defendant

Case No. 19-MJ-63
(Amended Criminal
Complaint)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

(1) On or about November 6, 2016 in the County of Cattaraugus, in the Western District of New York, the defendant, SHANE GUAY, did knowingly employ, use, persuade, entice, and coerce a minor who was under the age of 18 years, to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing visual depictions of such conduct, using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and the visual depictions were transported and transmitted using any means and facility of interstate and foreign commerce and the visual depictions were transported and transmitted in and affecting interstate and foreign commerce, in violation of **Title 18, United States Code, Section 2251(a) and 2251(e)**;

(2) On or about April 2, 2017 in the County of Cattaraugus, in the Western District of New York, the defendant, SHANE GUAY, did knowingly receive child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been shipped and transported using any means and facility of interstate and foreign commerce, and that had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, in violation of **Title 18, United States Code, Section 2252A(a)(2)(A) and 2252A(b)(1)**; and

(3) On or about June 5, 2018 in the County of Cattaraugus, in the Western District of New York, the defendant, SHANE GUAY, did knowingly possess child pornography, as defined in Title 18, United States Code, Section 2256(8), in violation of **Title 18, United States Code, Section 2252A(a)(5)(B)**.

This Criminal Complaint is based on these facts:

☒ Continued on the attached sheet.



Complainant's signature
NICHOLAS MELCHIORRE
SPECIAL AGENT
HOMELAND SECURITY INVESTIGATIONS
Printed name and title

Sworn to before me and signed in my presence.

Date: April 17, 2019



Judge's signature
HON. JEREMIAH J. MCCARTHY
UNITED STATES MAGISTRATE JUDGE
Printed name and title

City and State: Buffalo, New York

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

STATE OF NEW YORK)
COUNTY OF ERIE) SS:
CITY OF BUFFALO)

NICHOLAS MELCHIORRE, being duly sworn, deposes and states:

1. I have been employed as a Special Agent (SA) with Homeland Security Investigations (HSI), within the Department of Homeland Security (DHS), since 2010. As a Special Agent, I am a federal law enforcement officer within the meaning of Rule 41(a) of the Federal Rules of Criminal Procedure, that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, federal criminal offenses.

2. I have participated in investigations targeting individuals involved in the receipt, distribution and possession of child pornography, in violation of Title 18, United States Code, Section 2252A(a)(2)(A) and Title 18, United States Code, Section 2252A(a)(5)(B). I have received specialized training in the area of child pornography and child exploitation, and I have had the opportunity to observe and review numerous images and videos of child pornography, as defined in Title 18, United States Code, Section 2256. As part of my employment with HSI, I successfully completed the Federal Law Enforcement Training Center's Criminal Investigator Training Program and the Immigration and Customs Enforcement Basic School, both of which included instruction with respect to the application

for, and execution of, search and arrest warrants, as well as the application for criminal complaints, and other legal processes.

3. I make this affidavit in support of a criminal complaint charging **SHANE M. GUAY** (hereinafter "GUAY") with violations of Title 18, United States Code, Section 2251 [Production of Child Pornography], Section 2252A(a)(2)(A) [Receipt of Child Pornography], and 2252A(a)(5)(B) [Possession of Child Pornography].

4. The statements contained in this affidavit are based upon my investigation, information provided to me by other law enforcement personnel, and on my experience and training as a Special Agent of HSI. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth facts that I believe are necessary to establish probable cause to believe that GUAY knowingly violated Title 18, United States Code, Sections 2251, 2252A(a)(2)(A), and 2252A(a)(5)(B).

BACKGROUND OF THE INVESTIGATION

5. In November 2016, the Ayer and Shirley, Massachusetts Police Departments received reports that approximately fifteen 6th grade females attending the Ayer/Shirley Middle School had received unsolicited messages of a sexual nature from a male only known as "George" on the social media application Instagram. According to incident reports obtained from both the Ayer and Shirley Police Departments "George," utilizing Instagram user names "heythereitsme56", "helloimboored100", and "skellington1991" utilized the same modus operandi to attempt to solicit sexually explicit images from the minor victims attending

the Ayer/Shirley Middle School. Specifically, "George" spoke to the minor victims in a sexually explicit manner in an attempt to solicit the minor females to send him nude images of themselves. To some of the minor females, "George" at first alleged to be a lesbian minor female, and sent topless images of a minor female to the victims before he sent an unsolicited image of an erect Caucasian adult penis (hereinafter "IMAGE 1") to the minor females.

6. Ayer PD Officer Jennifer Bigelow, a School Resource Officer, took screen captures of one of the minor female's Instagram conversations with "George" who utilized both username "heythereitsme56" and "helloimbored100". Without solicitation, "George" sent the minor female IMAGE 1 and asked her if she liked it, followed by comments such as: "would you like it if I started rubbing your vagina..."; "I would slide a finger deep inside you making you moan..."; and "I was hoping you'd like it [IMAGE 1], and would trade pictures with me." The minor female made numerous attempts to end the conversation with "George", but he kept pressuring her to send him images of herself.

7. Officer Bigelow screen captured Instagram conversations between "George" and a second minor female from the Ayer/Shirley Middle school. In this conversation, "George" used screen names "heythereitsme56," "helloimbored100," and "skellington1991". In one of the conversations, "George" sent this minor female IMAGE 1 without solicitation and asked, "Do you like it cutie?" The minor responded, "Why did u send me a pic...fu...answer my question." "George" stated, "I was hoping you would like it, and would trade pictures with me." The minor female told "George", "No I am not sick like u."

8. Based in part on the evidence obtained above, and statements of six of the 6th grade students taken by Shirley Police Department Detective Olivia Siekman, on November

22, 2016, the Honorable Wendy A. Wilton, Clerk-Magistrate for the Trial Court of Massachusetts, District Court Department, Ayer Division issued a search warrant (1648SW0122) for the contents of the Instagram accounts related to usernames “heythereitsme56” and “hellomimbored100” between November 5, 2016 and November 8, 2016.

9. In response to the search warrant, Instagram reported that both username “heythereitsme56” and “helloimbored100” have Instagram user ID 4121932649.¹ The account was created on November 5, 2016 from IP address 2600:1017:b114:3d54:fc00:6f10:3e0d:677c, and the e-mail associated with the account is **shaneg1991@gmail.com**. Instagram reported a total of 9 unique IP addresses associated with the account during the time of the search warrant.

10. Detective Siekman’s analysis of the search warrant return from Instagram identified a picture of a Caucasian male’s face that appeared to have the same wooden paneling background as seen in IMAGE 1. Detective Siekman also identified a Facebook friend of one of the minor females from the Ayer/Shirley Middle School as “Shane Guay”. GUAY’s Facebook profile image was the same image observed by Detective Siekman in the search warrant returns from Instagram for account 4121932649. Further investigation by Det. Siekman identified GUAY as a resident of Olean, NY.

¹ Instagram users can change their usernames, but the user ID will remain the same.

11. In May 2017, the New York State Police ("NYSP") received all of the case materials from the Ayer/Shirley, Massachusetts investigation as it was determined GUAY was outside of the jurisdiction of Massachusetts.

12. Investigator John Lombardi with the NYSP reviewed all the case materials from Massachusetts. In addition to the observations made by Detective Siekman, Inv. Lombardi also noted that the "selfie" pictures in Instagram account 4121932649 were consistent with that of GUAY. Further, a tattoo on the subject's stomach depicts the animated character "Jack Skellington" consistent with one of the subject account's username's "Skellington1991." Inv. Lombardi further identified conversations with Instagram users "_l_e_o_n_X_X_" and "riisaXXXX", both of which were sexually explicit in nature. During both conversations, Instagram user "helloimboored100" sent both "_l_e_o_n_X_X_" (who presented herself as a teenage female) and "riisaXXXX" (who presented herself as a 10 year old female) IMAGE 1 without solicitation. After repeated requests for sexually explicit material, user "_l_e_o_n_X_X_" sent "helloimboored100" two images of what appears to be a minor female in her undergarments. In the conversation with "riisaXXXX", user "helloimboored100" sent images of his face and torso, both of which are consistent with GUAY, including displaying the Jack Skellington tattoo.

13. Inv. Lombardi obtained GUAY's driver's license information from the New York State Department of Motor Vehicles. GUAY was identified as Shane M. GUAY, DOB 5/04/19XX, 147 North 8th Street, Olean, New York 14760. GUAY's driver's license image

is consistent with images previously believed to be GUAY from the search warrant returns of Instagram account 4131932649.

14. Inv. Lombardi then served subpoenas on Verizon wireless for IP address 2600:1017:b114:3d54:fc00:6f10:3e0d:677c used to create Instagram account 4131932649 on November 5, 2016, as well as a sample of 24 IP log-in sessions across 8 different IP addresses used by the account during the time of the search warrant reference in paragraph 8. Results provided by Verizon Wireless identified all 25 IP session logs as resolving to mobile telephone number 716-307-13XX, under the billing account Carol Lata, 150 North 8th Street, Olean, New York 14760.

15. Further investigation by Inv. Lombardi determined that phone number 716-307-13XX is associated with the Facebook account of GUAY, and that Lata was likely the grandmother of GUAY based on comments of Lata's Facebook photos. In April of 2018, Inv. Lombardi re-confirmed that phone number 716-307-13XX was still associated with GUAY's Facebook account, and that GUAY was still a resident of 147 North 8th Street, Olean, New York 14760.

16. On April 17, 2018 HSI Buffalo received an investigative lead from the Harris County, Georgia Sheriff's Office. The referral identified two 12-year-old females from Harris County, GA who reported receiving unsolicited pictures and videos of an adult male penis from Instagram user "lets69befriends" and a second unassociated Instagram user in February 2018.

17. Case information provided by the Harris County Sheriff's Office contained a subpoena issued to Instagram on February 27, 2018 for customer account information and IP session logs for users "lets69befriends" on February 24 and 25, 2018. Records for user "lets69befriends" identified the user as: Johnny Quick, e-mail address burtonfan1991@gmail.com, and registration IP address 2600:1017:b11e:db42:cb32:8dc0:df61:f7b3 (February 2, 2018). Instagram reported 5 additional log in IP sessions for user "lets69befriends", one on February 11, 2018 using the same registration IP address, and 4 IP sessions using IP address 2600:1017:b122:6602:e12:6413:bfbf:6c09 (between February 10 and 11, 2018). A search of the American Registry for Internet Numbers (ARIN) identified both IP address 2600:1017:b11e:db42:cb32:8dc0:df61:f7b3 and 2600:1017:b122:6602:e12:6413:bfbf:6c09 as Verizon Wireless IPv6 IP addresses.

18. On April 5, 2018, Harris County, Georgia Magistrate Judge Jennifer Webb issued a subpoena to Verizon Wireless for customer account information relations to the IP sessions of user "lets69befriends" identified in paragraph 17. In response to the court order, Verizon Wireless identified the customer associated with IP addresses 2600:1017:b11e:db42:cb32:8dc0:df61:f7b3 and 2600:1017:b122:6602:e12:6413:bfbf:6c09 on the February 2, 10, and 11, 2018, respectively as:

- a. Shane Guay
- b. E-mail: burtonfan1991@gmail.com
- c. SMS²: 716-307-13XX

² Short Message Service phone number

19. On or about April 17, 2018, Inv. William Sturdevant of the Harris County Sheriff's Office sent an e-mail to burtonfan1991@gmail.com asking him/her to contact Inv. Sturdevant in reference to conversations Instagram user "lets69befriends" was having with a "victim". Burton1991@gmail.com responded to the e-mail two minutes after Inv. Sturdevant sent the e-mail with the following remarks, "I have deleted everything social media wise. Anything that has happened is over with. I was going through rough times and was saying things that were stupid. It was a massive mistake and I regret it." Although the body of the e-mail did not identify the author, Google's software identified the sender of this e-mail as "Shane Guay" in the "from" line of the e-mail.

20. On April 23, 2018, HSI Forensic Interview Specialist (FIS) Crystal Gregory conducted a forensic interview of one of the two minor female victims from Harris County, Georgia in Columbus, Georgia. During the forensic interview, the minor female recalled receiving an unsolicited, sexually explicit image of an adult Caucasian male's "privates" from Instagram user "lets69befriends". The minor stated she knew the individual using Instagram account "lets69befriends" was an adult based on the amount of hair on his body, and described his "privates" as "something someone pees out of." The minor female further stated that user "lets69befriends" threatened to kill himself if she did not send him "nude" photographs of herself. The minor never sent "lets69befriends" any images of herself. Further, the minor's mother responded to user "lets69befriends" to leave her daughter alone, and reported the event to the Harris County Sheriff's Office.

21. On May 31, 2018, NYSP Inv. Daniel Walsh applied for and was granted a NYS search warrant from the Honorable Daniel Palumbo, Olean City Court Judge, for

GUAY's residence located at 147 North 8th Street, Olean, New York 14760 (hereinafter SUBJECT PREMISES). This search warrant was based upon the referred investigation from the Ayer/Shirley Police Department referenced in paragraphs five through ten, and the NYSP follow up investigation identified in paragraphs eleven through fifteen.

22. On June 5, 2018, the NYSP and HSI Buffalo executed the NYS search warrant at the SUBJECT PREMISES. Contemporaneous to the search warrant execution, NYSP Inv. Daniel Walsh and HSI Special Agent (SA) Kathryn Gamble conducted a non-custodial interview with GUAY at the NYSP barracks in Olean, NY. When questioned about inappropriate conversations with underage females on Instagram, GUAY responded, "Obviously I did it, but I don't recall". Later in the interview, the defendant stated, "I'll admit it. I just don't personally remember it, but I did it. I'll say I did it, but I don't remember sitting there doing it," and "I know I fucked up and said (inaudible) things I shouldn't have; I admit that, but I don't remember every single time." GUAY then admitted that he received unsolicited nude images of minor females exposing their breasts and vaginas (between the ages of 14 and 16) via Instagram in the November/December 2017 timeframe. GUAY stated he last exchanged nude images with minor females in the December 2017/January 2018 timeframe. GUAY stated that any nude images he took of himself would have been taken in the bedroom of his residence and the SUBJECT PREMISES. GUAY stated that he knew that it was wrong to exchange nude images with minor females, and that any image of a nude minor female he received is considered child pornography. GUAY stated that he was the individual that sent Inv. Sturdevant the April 17, 2018 e-mail from e-mail address brutonfan1991@gmail.com referenced in paragraph nineteen. GUAY confirmed that he was the user of the Instagram account associated with usernames "lets69befriends,"

“helloimbored100,” “heythereitsme56” as well as e-mail address skellington1991@gmail.com. Further, GUAY stated that he used both a LG G4 and an LG G6 cellular phone to send and receive child pornography to and from minor females. These phones were located inside the SUBJECT PREMISES at the time of the search warrant and seized. GUAY stated that he located minor females to target for sexual conversations by locating one minor female on Instagram, then going through their friends/contact list, and thereafter randomly messaging those individuals. This modus operandi is consistent with the Ayer/Shirley PD investigation in November 2016. At the end of the interview, GUAY admitted to knowingly sending pictures of his penis to minor females that identified themselves as being between the ages of eleven and thirteen years of age, as well as soliciting nude images of the minor females in return.

23. Following the execution of the search warrant at the SUBJECT PREMISES, your affiant reviewed the NYS search warrant photographs and compared them to IMAGE 1. Photographs of Room 7 “Suspect Bedroom” were found to be consistent with the background in IMAGE 1. Based on your affiants training and experience, as well as GUAY’s statement identified in paragraph twenty-two, it is believed that the room portrayed in IMAGE 1 is in fact GUAY’s bedroom at the SUBJECT PREMISES.

24. In September 2018, your affiant met with members of the Ayer and Shirley PDs in Massachusetts, and received original copies of their investigative files, notes, and the Instagram search warrant return related to Instagram user “heythereitsme56” and “helloimbored100” in November 2016. Your affiant reviewed the Instagram search warrant return in detail and identified 37 profiles that GUAY communicated with between November

5, 2016 and November 8, 2016. GUAY sent IMAGE 1 unsolicited to 8 of the 37 profiles. Images contained in the conversations with two females clearly identifies them as being between eight and twelve years of age. Further, in one conversation, GUAY purported himself to be a twelve year old lesbian female, and in another he identified himself as a thirteen year old male to gain the trust of the minor females he was conversing with.

25. Your affiant also identified two conversations in which GUAY successfully requested and received nude images of the minor female Instagram users he was conversing with (both constitute child pornography as defined under 18 USC 2556), as well as one conversation in which a minor female was sent IMAGE 1 and responded to GUAY telling him to leave her alone. Administrative summonses were sent to Instagram for customer information and IP logs for the three identified Instagram accounts. IP session logs for these accounts identified the two accounts that sent GUAY self-produced child pornography as resolving to Cape Town, South Africa, and Ayer, Massachusetts, respectively. The account that received IMAGE 1 and told GUAY to leave her alone resolved to Marlborough, Massachusetts.

26. In November 2018, your affiant sent an investigative referral to the HSI Office of International Affairs (OIA) South Africa to locate and identify the minor utilizing the Instagram account whose IP logs resolved to Cape Town, South Africa and sent self-produced child pornography to GUAY at his request as detailed in paragraph 24 above. In December 2018, the South African Police Services (SAPS) issued a summons to Telkom SA (South African Internet Service Provider) for subscriber information related to the IP address in question. In February 2019, Talkom identified the account in the vicinity of Cape Town,

South Africa. The subscriber had the same last name as the last name identified in the minor female's Instagram username, which provided investigators with greater confidence that they identified the correct account.

27. Between February 26 through 28, 2019, HSI OIA SA Cynthia Roldan, HSI Foreign Service National Investigator (FSNI) Johan Claassen, and SAPS Forensic Social Owrker Captain Karin Botha, met with the minor female and her mother at their residence near Cape Town, South Africa to discuss the minor female's interactions with GUAY on Instagram in November 2016. During the interview, the minor recalled what she described as a two week period in 2016 in which an unknown male, purporting to being sixteen to seventeen years of age, engaged her and two of her friends in sexually explicit conversation on Instagram. The minor female stated about the second day of her communication with the unknown male, she realized he was older than her based on the way he was communicating and the language he used during the conversation. The minor told investigators that the male subject at first only asked her for photos of herself in her underwear, then eventually progressed to asking her for nude photos. The minor admitted to sending the male subject one photograph of herself at the subject's request.

28. SA Roldan presented the minor female with seven images exchanged between what was believed to be her Instagram account and GUAY's Instagram account "helloimbored100". Four of the images (image_00001, image_00003, image_00004, and image_00008) were suspected of being taken by the minor female and sent to GUAY on November 8, 2016; two of which meet the definition of child pornography under 18 USC 2556. The minor female positively identified all four images as images she took and sent to

the unknown male. SA Roldan then presented the minor female three images (image_00002, image_00012, and image_00013) sent from GUAY's Instagram account "helloimbored100" to the minor female. Image_00002 is an image of topless minor female approximately 8-12 years of age, and image_00013 is IMAGE 1. The minor female identified all three images as being sent to her by the unknown male in November 2016.

29. SA Roldan presented the minor female's mother images exchanged between her daughter and GUAY. The minor female's mother immediately recognized a dark brown wicker stand with drawers in the background of image_00001 sent from her daughter's Instagram account to GUAY as her daughter's bedroom. Image_00001 depicts a nude minor female from the neck to pelvic region with her underdeveloped breasts exposed and her hand covering her vagina. The minor female's mother also identified the black and white zebra print cloth in image_00008 as her daughter's pillow case. Image_00008 depicts a close up photograph of a buttocks with what appears to be white and bed zebra print bedding underneath the person's body. SA Roldan took exemplar photographs of the minor's bedroom and provided them to your affiant for review. The pillow case and wicker drawers described by the minor female's mother are visible in the exemplars and consistent with the items depicts in image_00008 and image_00001 as reported by the victim's mother.

30. On April 5, 2019, an HSI Forensic Interview Special conducted forensic interviews of two minor females in the Boston, Massachusetts area. Specifically, the minor female in Ayer, MA that potentially sent self-produced child pornography to GUAY as well as the minor female in Marlborough, MA that GUAY sent IMAGE 1 to without solicitation identified in paragraph 25.

31. The minor female from Ayer, MA, positively identified herself as the user of Instagram account “smileXXXX”. The minor female was shown the chat logs between “smileXXXX” and GUAY’s Instagram account between November 5 and November 6, 2016, and confirmed she was the user of “smileXXXX” in this conversation. The minor female told the interviewer she was 12 years of age during the time in question. The minor female was shown image_00000 (interview exhibit 2) which is a close-up image of blue material with a pink palm tree design. The minor female identified this as one of her articles of clothing and confirmed she took and sent that image to GUAY’s Instagram account. The minor female was then shown image_00001 (interview exhibit 1) which depicts the right arm of a Caucasian minor pulling down black pants and exposing an underdeveloped vagina. Based on my training and experience, this image constitutes child pornography. The minor female confirmed she took image_00001 and the individual depicted in the image is in fact her. The image was sent on November 6, 2016. Earlier in the conversation, the defendant requests, “Get a pic of your hole and spread it open so I can see.” Thereafter, the message contents provided by Instagram show the following conversation between the minor and GUAY at the time the minor sent image_00001:

a. GUAY – “Send pics in the chat and I’ll do whatever you want”

GUAY – “Baby”

Minor – “Hi”

GUAY – “Hi”

Minor – sent image_00001

32. The minor female from Marlborough, MA, positively identified herself as the user of Instagram account "spamXXXXX". The minor female was shown chat logs between "spamXXXXX" and GUAY's Instagram account between November 7 and November 8, 2016, and confirmed she was the user of "spamXXXXX" in this conversation. The minor female told the interviewer she was 12 years of age during the time in question. The minor female was shown IMAGE 1 (interview exhibit 1) and confirmed she was the individual who received this image unsolicited from GUAY's Instagram account on November 7, 2016, to which GUAY immediately sent the minor female the following questions, "Like it? Well do you like it?" to which the minor female responded "no." The minor female was then shown image_00001 which depicted a minor female with medium skin complexion sitting on an inflatable pool toy in a pool. The minor female confirmed the female in the image was in fact her, and that she had posted that image to her Instagram account in the past. Further, the minor female recalled receiving image_00001 (interview exhibit 2) from GUAY's Instagram account, as well as receiving the comments "This picture of you is so sexy. You are definitely such a super model :) I wish you could sit on me like that :) I would love it."

INTERIM FORENSIC ANALYSIS OF SEIZED EVIDENCE

33. On August 6, 2018, your affiant and HSI SA John Kosich took custody of 26 items of electronic evidence seized by the NYSP from the SUBJECT PREMISES on June 5, 2018. The evidence was transported and signed into to the HSI Buffalo Computer Forensics Lab in Buffalo, New York for forensic analysis. On February 11, 2019, your affiant received an Interim Forensics Examination Report of all 26 devices seized from the SUBJECT PREMISES. In total, 154 image files and 5 video files containing suspected child

pornography as defined under 18 USC 2256 were located on the seized devices. Of those files, numerous images and videos depict: minors under the age of 12 years; child pornography involved infant/toddler children; and the depiction of violence and/or the sexual abuse or exploitation of an infant/toddler. Examples of these files include:

- a. File 1 – MD5 hash³ 959A2BF9FA25D609DD559D344842DA1E: is an image file that was located on a LG G4 cellular phone, serial number 602CYCV0219059. This image depicts what appears to be a 6-10 year old Caucasian female lying on a blue/purple fabric with her nude legs spread exposing her underdeveloped vagina and anus. In the foreground of the image is a small brown-colored dog standing between the minor female's legs. The dog appears to be licking the minor female's vagina.
- b. File 2 – MD5 hash D6CB938083C535CA4D715AB68271E71D: is an image file that was located on an Acer Aspire laptop, serial number LU5DE0D1600347C6e41601. This image depicts what appears to be a 6-10 year old Caucasian female lying on white fabric with her nude legs spread exposing her underdeveloped vagina. What appears to be an adult Caucasian right arm and hand is pushing the minor female's left leg against her torso and an erect adult penis is penetrating her vagina.
- c. File 3 – MD5 hash C0D8C0C09FCD47CDD6706E0B8DF5CA93: is an image file that was located on a LG G4 cellular phone, serial number

³ A hash value is a unique digital signature for a particular data file, based upon a mathematical algorithm. Hashes give a file a "digital fingerprint."

602CYCV0219059. This image depicts what appears to be a 1-4-year-old Caucasian female lying on her back with her nude legs spread exposing her underdeveloped vagina. An erect Caucasian adult male penis being held by a right hand is touching the vagina as if it is about to be put in the vagina.

34. Further, your affiant conducted a review of the forensic images of the devices seized from the SUBJECT PREMISES for evidence that the devices found to contain files of child pornography were used by GUAY, and/or had artifacts consistent with a user actively seeking out child pornography. On the Acer laptop identified in paragraph 33 b., Google referral cookies identified 5 URLs consistent with child pornography. An example is "teenpronsearch.net" accessed on April 15, 2011. Additionally, 56 Google searches consistent with child pornography, including "horny underage teen", "preteen girl masturbation", and "preteen squirting cum" were located on the device. The LG G4 identified in paragraphs 33 a. and 33 c. bears telephone number 716-307-13XX. This number was previously identified as linked to GUAY's Facebook account in paragraph 15. Further, the associated e-mail address on this cellular phone is shaneg1991@gmail.com. This is the same e-mail address linked to Instagram account "helloimbored100". In addition to the child pornography files located on this device, the device's web history contained 22 URLs consistent with child pornography, including two with the titles: ""Young Lil Nymphs - Get fascinated by hot lesbian teen girls at Young Lil Nymphs!" and "11y jailbait Ashley M., 22158048_133066660666975_8326619 @iMGSRU.RU".


CONCLUSION

35. Based upon the forgoing, the undersigned respectfully submits that there is probable cause to believe **GUAY**, has violated Title 18, United States Code, Section 2251 [Production of Child Pornography], Section 2252A(a)(2)(A) [Receipt of Child Pornography], and Section 2252A(a)(5)(B) [Possession of Child Pornography].



NICHOLAS MELCHIORRE
Special Agent
Homeland Security Investigations

Sworn to and subscribed before
me this 17th day of April, 2019.



HON. JEREMIAH J. MCCARTHY
United States Magistrate Judge